

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**JENNIFER VANDERSTOK, *et al.***

**Plaintiffs,**

**v.**

**PAMELA BONDI, in her official capacity  
as Attorney General of the United States, *et al.***

**Defendants.**

**Civil Action No.  
4:22-cv-00691-O**

**MOTION TO WITHDRAW AS COUNSEL FOR POLYMER80, INC.**

Pursuant to Local Rule 83.12(a), Dennis L. Daniels, Jr. and James W. Porter, III of the law firm Bradley Arant Boult Cummings (“Attorneys”) move to withdraw as counsel for Polymer80, Inc.

Polymer80 has failed to fulfill its obligation to pay the Attorneys for their services in this case. The Attorneys request to withdraw to avoid an unreasonable financial burden. The Attorneys have taken steps reasonably practicable to protect the client’s interests. The Attorneys have informed Loran Kelley—the founder of Polymer80—of their intent to withdraw, and Mr. Kelley has approved such withdrawal. A true and accurate copy of Polymer80’s consent is attached as **Exhibit 1**. It is unlikely that other counsel will succeed the Attorneys as counsel of record for Polymer80.

**CONCLUSION**

For the foregoing reasons, the Attorneys respectfully request that this Court enter the proposed order granting withdrawal as counsel for Plaintiff Polymer80.

Respectfully submitted,

**BRADLEY ARANT BOULT CUMMINGS LLP**

By: /s/ Dennis L. Daniels Jr.

DENNIS L. DANIELS JR.

Texas Bar No. 24107402

dldaniels@bradley.com

3600 Fountain Place

1445 Ross Avenue

Dallas, Texas 75202

Telephone (214) 257-9846

Facsimile (214) 939-8787

/s/ James W. Porter, III

James W. Porter, III (admitted *pro hac vice*)

jporter@bradley.com

One Federal Place

1819 5th Avenue North

Birmingham, Alabama 35203

Telephone (205) 521-8285

Facsimile (205) 488-6285

**ATTORNEYS FOR POLYMER80, INC.**

**CERTIFICATE OF SERVICE**

I certify that on May 23, 2025, the foregoing document was served, via the Court's CM/ECF Document Filing System, upon the registered CM/ECF users in this action.

/s/ Dennis L. Daniels Jr.

Dennis L. Daniels Jr.